

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA : **CRIMINAL NO.** _____
v. : **DATE FILED:** _____
BLUE MARSH LABORATORIES, INC. : **VIOLATIONS:**
MICHAEL J. McKENNA : **18 U.S.C. § 371 (conspiracy - 1 count)**
: **18 U.S.C. § 1341 (mail fraud - 51 counts)**
: **33 U.S.C. § 1319(c)(4) (Clean Water Act**
violations - 30 counts)
: **18 U.S.C. § 1001 (false statements - 2**
counts)
: **18 U.S.C. 2 § (aiding and abetting)**

INDICTMENT

COUNT ONE

(Conspiracy)

THE GRAND JURY CHARGES THAT:

INTRODUCTION

At all times relevant to this indictment:

1. Defendant MICHAEL J. McKENNA was the president, laboratory director and owner of defendant BLUE MARSH LABORATORIES, INC. (hereafter "BLUE MARSH"), located at 1605 Benjamin Franklin Highway, Douglassville, Pennsylvania. McKENNA, a chemist with a bachelor of science degree in chemistry, was experienced in organic and inorganic chemistry and instrument analysis, and was responsible for insuring that the BLUE MARSH laboratory was properly equipped and staffed.